

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF MISSISSIPPI
3 NORTHERN DIVISION

4 MICHAEL COREY JENKINS, et al. PLAINTIFFS

5 VS. CAUSE NO. 3:23-cv-374-DPJ-ASH

6 RANKIN COUNTY, MISSISSIPPI, et al. DEFENDANTS

7 *****

8 DEPOSITION OF EDDIE TERRELL PARKER

9 *****

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11
12 Taken at offices of
13 Trent Walker, Counselor at Law, PLLC,
14 5255 Keele Street, Suite A,
15 Jackson, Mississippi,
16 on Friday, February 24, 2025,
17 beginning at approximately 11:05 a.m.

18
19
20 *****

21 CATHY M. WHITE, CCR
22 Certified Court Reporter #1309
23 Notary Public

1 A P P E A R A N C E S

2

3 TRENT L. WALKER, ESQUIRE
Trent@Trentwalkerlaw.com
4 Trent L. Walker, Counselor at Law, PLLC
5 5255 Keele Street, Suite A
Jackson, Mississippi 39206
601.321.9540

6

7 COUNSEL FOR PLAINTIFFS

8

9 JASON E. DARE, ESQUIRE
jdare@bislawyers.com
Biggs, Ingram & Solop
Post Office Box 14028
10 Jackson, Mississippi 39236-4028
601.987.5307

11

12 COUNSEL FOR DEFENDANTS

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17 1 Amended Complaint (not attached) 11

18 2 1/24/23 Statements and incident reports 65
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19 3 Incident reports of various dates 72
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1 EDDIE TERRELL PARKER,
2 having been duly sworn, was examined and testified as
3 follows:

4 EXAMINATION

5 BY MR. DARE:

6 Q. Can you state your full name for the record,
7 please, sir?

8 A. Eddie Terrell Parker.

9 Q. Mr. Parker, my name is Jason Dare. I am
10 representing Sheriff Brian Bailey in a lawsuit that
11 you and Michael Jenkins filed, and we're going to
12 discuss some of the facts about that here today. Have
13 you ever given a deposition before?

14 A. No, sir.

15 Q. I'll walk you through a few ground rules, and
16 you'll hear a lot from your counsel and from me on
17 some of these issues. You notice that we don't have a
18 judge here, we don't have a jury here, but we've got a
19 court reporter, and she's taking down everything that
20 you say and everything that I say.

21 A. Okay.

22 Q. So when I'm asking a question, wait until I
23 finish asking before you start answering.

24 A. Okay.

25 Q. So that the court reporter can get everything

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1 even through today's date, made or been paid any
2 amount of money as a result of the incident that
3 occurred on January 24 of 2023?

4 A. No, sir.

5 MR. WALKER: For my edification, when you say
6 "paid any amount of money," you mean made in
7 settlement or what exactly?

8 MR. DARE: Any amount of money for any
9 reason.

10 MR. WALKER: You can answer.

11 A. No.

12 BY MR. DARE:

13 Q. You've given statements about the incident to
14 several news media -- news outlets. Right?

15 A. Yes, sir.

16 Q. In fact, some of these were done out of
17 state. Right?

18 A. Uh-huh.

19 Q. "Yes"?

20 A. Yes. My bad.

21 Q. Where all have you been to provide statements
22 about this incident?

23 A. Places or states?

24 Q. States will be fine.

25 A. Washington, D.C., was the only one.

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1 Q. Who did you give a statement to when you went
2 up to Washington, D.C.?

3 A. CNN. You know what I'm saying? Was there
4 another one? There's another one. I can't remember
5 the name of it. I can't recall that one. It was one
6 more. State of the Nation, something like that. I
7 can't remember the exact name.

8 Q. Somebody else, though?

9 A. Yeah, it was another one.

10 Q. How long did you stay up in D.C.?

11 A. I would say maybe a little over a month.

12 Q. Where did you stay when you were up in D.C.?

13 A. We stayed in -- I think it was a house that
14 was owned by Mr. Shabazz.

15 Q. How did you get up to D.C.?

16 A. A plane ticket was provided.

17 Q. By who?

18 A. I think it was maybe donation. And they were
19 coming in from -- I don't know where, you know. I
20 just know it was donations, you know, bought it for
21 us, so we took it and pretty much used it for, I
22 guess, safety reasons, yeah.

23 Q. When you were up there, did you have spending
24 cash?

25 A. We didn't really need anything as far as

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1 spending. You know, everything that was -- that we
2 had was provided as far as food and all. But we
3 didn't -- we didn't really need any spending. We
4 didn't need to go anywhere to spend.

5 Q. Your food, was the house that you were
6 staying in, was that fully stocked with all the food
7 that you wanted?

8 A. Yes, sir. Yes, sir.

9 Q. And so to your knowledge, Mr. Shabazz
10 provided you with the food for staying up there?

11 A. Yes, sir.

12 Q. Did he also provide you clothes or things to
13 wear, shoes, anything else?

14 A. We took all that with us.

15 Q. From Mississippi?

16 A. Yes, sir.

17 Q. Yes. Do you remember the address of the
18 house where you stayed?

19 A. The road was Sheriff Road. I can't remember
20 the numbers.

21 Q. Sheriff?

22 A. (Witness nods head up and down.)

23 Q. S-H-E-R-I-F-F?

24 A. Yes, sir.

25 Q. Road?

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1 A. Yes.

2 Q. What was the city?

3 A. All I know is Washington, D.C. We were
4 maybe, I want to say, 15, 20 minutes from our state's
5 Capitol -- or our nation's Capitol.

6 Q. Did Mr. Shabazz also get y'all a car, a
7 vehicle to ride around in?

8 A. We did Uber while we was there.

9 Q. Did you ever have to pay for the Uber?

10 A. No, sir.

11 Q. Mr. Shabazz paid for all that?

12 A. Everything was provided through donations.

13 Q. The house was provided through donations?

14 A. I'm not sure.

15 Q. How do you know that, as you say, everything
16 was provided for by donations?

17 A. That was -- it was the thing -- that what he
18 was telling us, you know, we have --

19 MR. WALKER: Anything that was discussed
20 between you and any of your attorneys does not
21 have to be disclosed under the attorney-client
22 privilege.

23 MR. DARE: Correct.

24 BY MR. DARE:

25 Q. So continue your answer, but without you

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1 including anything that Mr. Shabazz or Mr. Walker told
2 you.

3 A. Just going on, you know, as far as what we,
4 you know, knew, I mean, where we have, you know,
5 people that were donating, you know, to us, so we was
6 under that impression, you know, where these -- you
7 know, it was given to us. I mean, hey, we don't -- we
8 didn't do anything more than what we, I guess, planned
9 on doing, mainly going for safety, so we didn't need
10 anything more than that.

11 Q. Did you know who those donors were?

12 A. No, sir. I have a laundry list online that
13 they kept, you know, whenever they donate. We didn't
14 ever go, you know, through it and just, you know,
15 single out and, you know, look at all of them.

16 Q. But you do have a list available of those
17 donors?

18 A. Well, the internet has a list, you know.

19 MR. WALKER: Let me break in. There was, at
20 one point in time after the incident, there was a
21 GoFundMe that was set up in particular because
22 Michael had an extensive amount of medicals that
23 were expected, and so that is what he's referring
24 to.

25 MR. DARE: And I'm just trying to get what

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1 Mr. Parker knows.

2 MR. WALKER: Sure.

3 MR. DARE: Actually, and for the record,
4 Rankin County paid for Michael's medicals. But we
5 can get into that later.

6 BY MR. DARE:

7 Q. According to your knowledge, where did this
8 money come from?

9 A. It was, like I said, everything was online,
10 GoFundMe. That's what -- you know, that's what we
11 saw.

12 Q. Did you set up the GoFundMe?

13 A. No. No, sir.

14 Q. Who set it up, to your knowledge?

15 A. I'm not -- I'm not sure on that.

16 Q. Would you -- if you went up there and had to
17 stay in D.C. and you had to pay for it out of your own
18 pocket with the food, the Ubers, and everything else
19 that you got out of it, do you think that would -- the
20 value of that would exceed \$1,500?

21 MR. WALKER: Object to the form of the
22 question.

23 You can answer if you know.

24 A. If I didn't -- I can't tell you because I
25 didn't keep up with the number. I didn't have any

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1 receipts. I didn't have any, you know, card or
2 anything to -- I guess I was glad everything was done,
3 you know, through the way it was done. So we had
4 someone taking care of that. We didn't really have
5 any, you know, money, and I guess I wasn't really
6 paying.

7 BY MR. DARE:

8 Q. From your understanding, the person taking
9 care of that was Mr. Shabazz?

10 A. Well, someone he, you know, had or head of
11 that, I don't know. But it was just, you know, we
12 were following, you know, his advice on, you know, a
13 lot of things. So I can't say it was provided, you
14 know, out of his pocket at all.

15 Q. You've got Exhibit 1 before you, and I'm
16 going to start out with paragraph 16 of your Amended
17 Complaint. A lot of these initial paragraphs talk
18 about what the deputies did before arriving at 135
19 Conerly Road. Do you have any personal firsthand
20 knowledge of what the deputies were doing and the text
21 messages they sent prior to arriving at 135 Conerly?

22 A. No, I do not.

23 Q. What had you been doing that day prior to the
24 deputies' arrival?

25 A. Mainly what I did every day, clean, cleaning.

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21

1 A. No, sir.

2 Q. Do you know his name?

3 A. No, sir.

4 Q. Was there a lot of crime that happened at 135
5 Conerly while you were staying there?

6 MR. WALKER: Object to the form.

7 You can answer if you know.

8 BY MR. DARE:

9 Q. If you know.

10 A. No.

11 Q. I've seen, in some of the records, that
12 Michael Jenkins had a vehicle broken into at 135
13 Conerly at one point.

14 A. I'm not sure.

15 Q. Did you know anything about that?

16 A. No, sir.

17 Q. Did y'all ever have parties at 135 Conerly
18 when Kristi wasn't there?

19 A. No.

20 Q. Were there ever drugs being used at 135
21 Conerly that you saw?

22 A. Yes.

23 Q. How often would that happen?

24 A. Not as often as -- I can think -- it wasn't
25 very often.

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1 Q. What day of the week was January 24th, 2023?

2 A. I want to say it was a Wednesday, Thursday.

3 Q. Were you friends with Michael Jenkins before
4 this incident?

5 A. Yes, sir.

6 Q. Do you know why he was over at the house that
7 afternoon?

8 A. He was there working with a guy that rented a
9 room out there.

10 Q. What was that guy's name?

11 A. John. I can't remember his last name.

12 Q. And John had been renting a room out, you
13 said?

14 A. Yes.

15 Q. Now, and recall I had asked you earlier about
16 everybody who lived there on January 24 of '23. Was
17 John living there at that time?

18 A. Yes.

19 Q. Was there anybody else beside you, Kristi,
20 and John living there?

21 A. No.

22 Q. Do you know where John is today?

23 A. No.

24 Q. So John had been at 135 Conerly earlier in
25 the day with Michael Jenkins?

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1 A. Yes, sir.

2 Q. And this was before any of the milk, or
3 alcohol, or anything else. Right?

4 A. Yes.

5 Q. Now, after the dildo, were you still sitting
6 on the couch area?

7 A. Yes, sir, for a moment.

8 Q. And the deputies were asking you what as they
9 were doing these acts?

10 A. They asked what were we doing there, why are
11 we, you know, why are we over there, why are we -- are
12 we supposed to be there, whatever, you know, why
13 y'all -- why you got jugs around and all this over
14 here. It was just, you know, coming from here to here
15 to here. You know what I'm saying? Like, you know,
16 they're trying to answer, just -- it was kind of
17 kamikaze there.

18 Q. And did you have any drugs in the house on
19 that day?

20 A. No, sir.

21 Q. Have you ever done drugs in that house?

22 A. Yes, sir.

23 Q. But you just didn't have any that day?

24 A. No, sir.

25 Q. When they were pouring milk and alcohol, were

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1 And, "Brother, they shot me. They shot me."

2 When they come back in, they picked -- got me
3 up. You know, they went over and checked on him.

4 They said, "He's bleeding fast. He's bleeding fast."

5 They got me up, took me out, took me through
6 the kitchen, through the laundry room, out the back
7 door on the, you know, the carport, took me around the
8 house back around to the front, put me in the second
9 police truck that was parked there by the carport.

10 Q. Okay.

11 A. Because it was like the carport and the
12 grass. One was pulled in the grass and the other one
13 was right behind it. So right behind it facing
14 Kristi's door, I could see, you know -- like, couldn't
15 see Michael's face or anything, but I could see him,
16 his body, you know, through the crack. And I was
17 sitting in the truck looking at him on the floor. And
18 when I went out, I think it was like three of them, so
19 I want to say Brett McAlpin, Middleton, and I don't
20 know who else, were back in the huddle, you know,
21 talking and, you know, I guess what they were trying
22 to come up with, whatever they were coming up with.

23 And then one of them walked me around. I
24 can't remember who exactly, which one it was, walked
25 me around and put me in the truck. After that, it was

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1 more I was like sitting out there watching it, you
2 know, seeing them all go through the house and they
3 had the flashlights on, see them all just going
4 through the house. And it was raining and all, so I
5 couldn't really hear anything, you know. And so I was
6 just basically sitting there watching shadows and
7 light and all, you know.

8 And that's when McAlpin come out and got me
9 out and started going over with me what he wanted me
10 to say.

11 Q. Okay. What did he tell you exactly?

12 A. He came out. He said, "What happened? I
13 wasn't here."

14 I'm like, "You just saw him shoot him. You
15 know they shot at him."

16 He said, "I wasn't here." You know, I didn't
17 understand. I'm looking at him like...

18 So I kind of, you know, got the gist without
19 him telling me, you know, say this, say that, he
20 wasn't there. He was there. He came and he let
21 Michael got shot, and then he come back, and I didn't
22 see anything, I was being walked out while, you know,
23 when the gunshot went off, so my vision was blocked,
24 so I don't know. You know what I'm saying? If
25 Michael, you know, tried to go in or what. I don't

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1 know. I just know, you know, I was being walked out.
2 I didn't see anything. All I heard was a gunshot.

3 MR. WALKER: Just so I'm not confused, the
4 last part of what you just said, is that what
5 happened or is that what you were told to say?

6 MR. DARE: Counsel, you can clarify it.

7 MR. WALKER: Okay, yeah. To clarify, is that
8 what happened or --

9 MR. DARE: Well, no. I mean, you can ask
10 questions when it's your turn to ask questions.

11 MR. WALKER: Okay. Fine.

12 THE WITNESS: That's what I was coerced to
13 say.

14 BY MR. DARE:

15 Q. Do you remember him, McAlpin, telling you to
16 say anything else?

17 A. Only thing he said was he wasn't there.

18 Q. And he was telling you to lie about what
19 happened before anybody else got there. Right?

20 A. Yes.

21 Q. He was telling you to lie to the Sheriff, to
22 other investigators, to everybody else. Is that
23 right?

24 MR. WALKER: Object to the form.

25 You can answer if you know.

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1 A. That was the --

2 BY MR. DARE:

3 Q. Yeah.

4 A. He didn't tell me who to lie to or who to
5 tell.

6 Q. Everybody.

7 A. Yes, everybody, whoever asked.

8 Q. Right.

9 A. Yes.

10 Q. And, in fact, I think the next day, you were
11 sat down and you talked with somebody from MBI.
12 Right?

13 A. Yes.

14 Q. You had an interview about this incident?

15 A. Yes.

16 Q. And you did, in fact, lie during that
17 interview?

18 A. Yes. Yes.

19 Q. Even though you knew that that was a crime to
20 lie during that interview?

21 MR. WALKER: Object to the form.

22 You can answer.

23 BY MR. DARE:

24 Q. And I'm not faulting you for it. You were
25 told to lie?

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1 A. Yes.

2 Q. And you did?

3 A. Yes.

4 Q. And, well, I guess, did you know, prior to
5 all of these deputies being arrested and incarcerated
6 for lying about it, did you know that it was a crime
7 to lie to investigators about it?

8 A. Under certain circumstances, my knowledge
9 was, I tell them what they want me to tell them, I'm
10 not lying.

11 Q. If you tell the investigators what McAlpin
12 wanted you to tell them, then you weren't lying? It
13 was still lying.

14 A. It would be lying for McAlpin.

15 Q. Right. You were lying for McAlpin?

16 A. (Witness nods head up and down.)

17 Q. Is that right?

18 A. Yes.

19 Q. And you didn't stay in jail very long, did
20 you?

21 A. No, sir.

22 Q. In fact, Sheriff Bailey released you the very
23 next day, did he not?

24 A. Yes, sir.

25 Q. Did you talk with Sheriff Bailey at all that

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1 night of the incident?

2 A. No, sir.

3 Q. And did you talk with Sheriff Bailey at all
4 since that incident?

5 A. No, sir.

6 Q. Have you ever spoken with Sheriff Bailey?

7 A. Yes.

8 Q. Before all this?

9 A. Yes.

10 Q. All right. Was that when you were in jail?

11 A. Yes.

12 Q. And Sheriff Bailey would come around.

13 There's been some testimony about him bringing
14 presents to folks around Christmas. I think he also
15 brought turkeys around Thanksgiving. Is that when you
16 were talking with him?

17 MR. WALKER: Object to form.

18 You can answer if you know.

19 A. I don't remember no turkeys, but he brought
20 us a bag from -- yes, I guess from the jail.

21 BY MR. DARE:

22 Q. Were you ever a trustee over there?

23 A. No, sir.

24 Q. Did you ever get together through any of
25 Brother Aubrey's classes, the Christian Ministry

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1 classes?

2 A. As far as that went, I did the Bible studies
3 and I got baptized again, so that's as far as I went
4 with the ministry, yes, sir.

5 Q. Did you ever take any of the GED classes
6 or -- like, you already had your high school.

7 A. Yes, sir.

8 Q. Did you ever get to take any of the college
9 classes?

10 A. No, sir.

11 Q. So as far as your conversations with Sheriff
12 Bailey, all those were positive. Right?

13 A. Yes, sir.

14 MR. WALKER: Object to the form.

15 You can answer.

16 A. More of, "Hi, how you doing," that sort of
17 context. It wasn't -- it wasn't an elaborate, you
18 know, just catching up or anything, you know.

19 BY MR. DARE:

20 Q. Right.

21 A. It was just a, "Hey, how you doing," told him
22 my name.

23 Q. You had some pictures taken after you got out
24 of jail. I think they were of your back.

25 A. Yes, sir.

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1 Q. What was that showing?

2 A. Where I got hit in the back with the board,
3 and where I was tased and they pulled the prongs out,
4 whatever those are.

5 Q. And did you have any other lasting effects
6 from the alcohol, or the milk, or the grease, or --
7 and the Tasers, anything else?

8 MR. WALKER: Object to the form.

9 BY MR. DARE:

10 Q. You can answer it.

11 A. I mean, as far as where the prongs went in,
12 they kind of -- you know, they had a little irritation
13 to it.

14 Q. On your back?

15 A. Yes, sir.

16 Q. Okay. How long did that last?

17 A. Maybe two, three days.

18 Q. Anything else?

19 A. I'm scared to drink milk to this day.

20 Q. Don't like milk?

21 A. Huh-uh. I don't drink alcohol. I quit
22 drinking alcohol before that, you know, but I -- it
23 made me not even want to touch it even more.

24 Q. Did McAlpin or any of the other deputies give
25 you any other cover-up story to give to investigators?

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1 A. No.

2 Q. Did you ever see them take down the video
3 cameras from the front?

4 A. No, they didn't take down the camera.

5 Q. Okay. So they never took any of those down?

6 A. They didn't mess with the cameras. Only the
7 modem is what the -- where it recorded.

8 Q. Did you see them do that?

9 A. No, sir.

10 Q. You just heard about it afterwards?

11 A. When I made it back home, I saw it was gone.

12 Q. You know it was there beforehand?

13 A. Positive.

14 Q. In earlier depositions in this matter, I'll
15 represent to you that both Sheriff Bailey and
16 Christian Dedmon testified they didn't know what the
17 Good Squad was before this. Had you ever heard of
18 Goon Squad before this?

19 A. No, sir.

20 MR. DARE: Let's go off the record.

21 (Recess.)

22 (Exhibit No. 2 marked.)

23 BY MR. DARE:

24 Q. Mr. Parker, I've had marked as Exhibit 2 to
25 your deposition certain statements and incident

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1 reports that were turned over to the Rankin County
2 Sheriff's Department after this January 24, 2023,
3 incident. These are the incident report from
4 Christian Dedmon, which is RC0248; Hunter Elward's
5 incident report, RC0249; Brett McAlpin's incident,
6 report RC0250; Daniel Opdyke's incident report,
7 RC0251; and next, the last couple of supplements, and
8 then Lieutenant Middleton's supplement, which is
9 RC0252. I had this marked when we were off the record
10 and gave you the opportunity to read through those.

11 A. Uh-huh.

12 Q. Have you had a chance to look over each of
13 those?

14 A. Yes.

15 Q. Is there anything truthful about anything in
16 Exhibit 2 to your deposition or are all of these
17 incident reports and supplements false?

18 A. All of them are false.

19 Q. Except for maybe the date that all of this
20 happened?

21 A. The date, the names and the papers is the
22 only thing that's real about this.

23 Q. Right.

24 A. Yes.

25 Q. Now, after meeting with MBI, did you also

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1 meet with agents from the FBI?

2 A. No, sir.

3 Q. So the only time that you've ever given an
4 interview to anyone with either FBI or MBI was that
5 day after the incident. Correct?

6 A. Correct.

7 MR. WALKER: Excuse us.

8 Back on.

9 BY MR. DARE:

10 Q. And during the prosecution of these six
11 officers, five of whom were from Rankin County, did
12 you assist the U.S. Attorney's Office with the
13 prosecution at any point in time?

14 A. I wasn't questioned by them, so I mean, as I
15 say, wasn't anything more than what the -- I mean, I
16 can't remember if I -- I don't remember being, like,
17 asked any questions as far as interrogation by them.

18 Q. You didn't provide any set of -- you didn't
19 provide the true statement of facts to anybody with
20 the state or federal government as part -- as part of
21 the initial investigation or anything up to
22 sentencing?

23 A. No, sir.

24 Q. And the only time that you provided a
25 statement about anything was when it was leading into

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1 sentencing and they had already pled guilty. Is that
2 right?

3 A. Yes, I would say. I think it was.

4 Q. And did you know --

5 MR. WALKER: Hold on. Let's go off the
6 record for a second.

7 MR. DARE: He can only -- he's got to testify
8 about what he knows and what he doesn't know.

9 THE WITNESS: Like, well, okay. What I'm
10 going to try to understand is -- okay. If you're
11 asking me was I questioned by any attorney from
12 the U.S. office --

13 MR. WALKER: U.S. Attorney?

14 THE WITNESS: -- U.S. Attorney's Office, I
15 mean, I wasn't interrogated. I wasn't sat down
16 and talked to no more than what I did with MBI.
17 MBI was the only thing that I was -- I talked
18 with, you know, before the FBI come and did the
19 search of the property, you know. They come and
20 did a search. I didn't talk to anybody from the
21 FBI as far as about what happened, or they didn't
22 ask me any questions about anything. They just
23 told me what they found and gave me, you know, a
24 paper to sign. Other than that, they wasn't -- we
25 didn't go anywhere with the Attorney General and

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1 sat down and talked with them about it or anything
2 like that.

3 BY MR. DARE:

4 Q. That's what I was asking.

5 A. Yeah, yeah, yeah. So the only thing, you
6 know, was from MBI.

7 Q. And were you aware that Sheriff Bailey was
8 the one that called in MBI to investigate the
9 incident?

10 A. No, sir.

11 Q. MBI was already there and investigating by
12 the time that you got out and had gotten back to the
13 house. Correct?

14 A. Before I left the house.

15 Q. They were already there and investigating
16 before you even left the house?

17 A. Yes. MBI came maybe around -- I want to say
18 around 2:00 that morning. And, see, I was questioned.
19 Then he told me he would be back -- he would be in to
20 see me that morning when I was in jail to requestion
21 me with a recorder, yes.

22 Q. So he actually questioned you when you were
23 sitting in the back of Opdyke's vehicle?

24 A. Yes, sir. I got out of the vehicle.

25 Q. And "he" being the MBI agent?

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1 A. Yes.

2 Q. You stepped out?

3 A. Yes, sir.

4 Q. But you gave him the exact same statement
5 that McAlpin had told you to say that night. Right?

6 A. Well, what McAlpin had coerced me to say.

7 Q. Right.

8 A. Yeah.

9 Q. Demanded that you say.

10 A. Yeah.

11 Q. However you want to put it.

12 A. He didn't give me any words. He just, you
13 know, coerced me pretty much.

14 Q. Sure. How did you first meet Malik Shabazz?

15 A. I met Malik Shabazz through a phone call
16 through me and Michael's dad. He told me he had an
17 attorney he wanted me to talk to about, you know, the
18 case.

19 Q. Michael's dad did?

20 A. Yes.

21 Q. Did you know Mr. Shabazz or anything about
22 what he did prior to that phone call?

23 A. I never knew the man existed.

24 Q. When you were living at 135 Conerly, how much
25 was your rent?

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1 getting that. I'm not getting anything. I guess they
2 was thinking -- a lot of people were thinking that we
3 had already gotten a check or gotten paid, you know,
4 from Rankin County or -- how, I don't know. But I
5 mean, when you sit back and talk, you know, with them
6 now, you know, that's what it was. There's envy now.
7 You know, it was not a problem -- you know, I call her
8 and she talk to me all the time. So I mean, it's like
9 it just happened, used to it happened, you know. It
10 was just another day and a different time.

11 Q. You've got Exhibit 3 still? All right. So
12 flipping back RC-338 and 339. Remember when you get
13 booked in over at the jail and they ask you about all
14 these questions and --

15 A. Uh-huh.

16 Q. -- see what's going on with you. And then
17 you actually sign it on the back. Right? On 338,
18 that's your signature?

19 A. Uh-huh.

20 Q. "Yes"?

21 A. Yes, sir.

22 Q. And it asks, "Does inmate have any visible
23 signs of trauma, illness, obvious pain or bleeding
24 requiring immediate medical attention?" The answer
25 was "yes," and said that you had a small cut on your

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1 head. Do you see that?

2 A. Yes.

3 Q. Is that all correct?

4 A. Yes, I had a small cut on my head.

5 Q. But nothing else was disclosed. And
6 understand, I'm not saying it didn't happen. Nothing
7 else was disclosed at that time that it happened.

8 Right?

9 A. I mean, the marks and stuff on my back, but I
10 mean, it wasn't -- didn't need medical attention.

11 Q. And were you trying to keep that hidden from
12 the folks at the jail because of what Brett McAlpin
13 had told you?

14 A. No. It was noticed upon my entrance into
15 the back of the jail, before I passed the nurse's
16 office. You know, when I was changing out, that's
17 when he was -- the guy asked me if I wanted to see the
18 nurse, you know, and I told him yeah, I will, just in
19 case. And it was all told, it was all, you know,
20 noticed, you know, by eye, by vision, you know.

21 Q. Okay. So they noticed that you had some
22 marks on your back?

23 A. Yeah. I told them I had the, you know,
24 marks, and they -- they saw my face all disheveled and
25 all.

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1 Q. And what did they give you?

2 A. Nothing. I mean, she may have wrapped it or
3 put a bandage on it or somehow, I can't remember. I
4 mean, nothing that she could have gave me to, I guess
5 make it a -- relieve anything.

6 Q. Did you need any other medical attention?

7 A. Not really, no more than what I -- I couldn't
8 feel, you know, that night, but I mean, the next
9 morning was more just soreness, you know. I wasn't --
10 don't think anything was broken where I couldn't
11 function, I guess.

12 Q. You've sued Sheriff Bailey in this lawsuit,
13 but you said you only talked to him a handful of times
14 and that's when he was bringing gifts to the jail. Is
15 that right?

16 A. One time.

17 Q. One time?

18 A. (Witness nods head up and down.)

19 Q. Do you wish that you had told Sheriff Bailey
20 or MBI or anybody else the truth earlier on?

21 MR. WALKER: Object to the form of the
22 question.

23 You can answer.

24 A. I wish I had a chance to privately, you know,
25 have a talk with him about what had went on, yeah.

1 CERTIFICATE OF COURT REPORTER

2 I, Catherine M. White, CSR, and Notary Public
3 in and for the County of Rankin, State of Mississippi,
4 hereby certify that the foregoing pages, and including
5 this page, contain a true and correct transcript of
6 the testimony of the witness, as taken by me at the
7 time and place heretofore stated, and later reduced to
8 typewritten form by computer-aided transcription under
9 my supervision and to the best of my skill and
10 ability.

11 I further certify that I placed the witness
12 under oath to truthfully answer the questions in this
13 matter under the power vested in me by the State of
14 Mississippi. I further certify that I am not in the
15 employ of or related to any counsel or party in this
16 matter, and have no interest, monetary or otherwise,
17 in the final outcome of the proceedings.

18 Witness my signature and seal this the 10th
19 day of March, 2025.



21 CATHERINE M. WHITE, CSR No. 1309

22 My Commission Expires:
23 February 1, 2026

24

25